

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION** 2005 DEC -7 A 9:37

Theodore Davis,	)		
Plaintiff	)		
v.	)	Case No.	<u>2:05-cv-632-MHT</u>
	)		
Armstrong Relocation, Lln,	)	<b>PLAINTIFF'S T. DAVIS' RESPONSE TO</b>	
	)	<b>THE ORDER OF THE COURT</b>	
Edna Dumas, City of Montgomery,	)	<b>FOR DETAILED LIST &amp; REPLACEMENT</b>	
et. Al.	)	<b>VALUE OF PERSONAL PROPERTY TAKEN</b>	
Defendants.	)		

DELOAN HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

**PLAINTIFF'S T. DAVIS' ITEMIZED LIST OF PERSONAL PROPERTY  
AND THE ESTIMATED COST TO REPLACE ITEMS**

Comes Now the Plaintiff, Theodore Davis, via counsel Michael Rountree, and submits the following information as his list of the value of the personal property taken and destroyed.

1. The following list is provided to the Court naming the items taken as remembered to date in this matter;

**A. FORMAL LIVING ROOM**

- (1) 8FT Antique English sofa (four pillow) \$800.00
- (1) Queen Anne Chair, \$300.00
- (1) Entertainment center w/27" color TV and VCR \$500.00
- (1) Marble top coffee table \$400
- (1) Marble top end table with drawer \$200.00
- (1) 4ft Marble plant stands \$ 100
- Total for this room \$ 1900.00

**B. DEN**

- (1) 54" color TV w/Motorola surround sound DVD VCR comb. player \$3,500.00
- (1) 5' Tall fish aquarium \$400.00
- (1) Sectional sofa \$900.00
- (1) Glass and wooden coffee table 3'x4' \$500.00
- (1) Gold framed mirror 3'x4' over fire place \$400.00
- (1) Wall Grandfather clock \$300.00
- (1) Sonya FM! AM CD and Cassette player with Remote control \$300.00
- (2) Kenmore Amps \$600.00
- (2) Antique model cars; pictures, vases, etc. \$2,000.00
- (2) Brass table lamps \$300.00 (1) Area floor rug 8x10 and 6x3 runner \$400.00
- (1) Bag of VCR tapes \$400.00
- (1) Box of assorted CD's and DVD disks \$400.00

Total for this room \$10,400.00

**C. HALL LINEN COSET**

- (4) New bed in a bag (x-mas gifts) \$500.00
- (1) King and one full size electric blanket \$150.00
- (1) Full size handmade afghan Sheets, pillow cases, spreads and blankets for Full size bed and king size bed \$2,500.00
- Table cloths, napkins, shower curtains and Window curtains w/matching garbage cans and 'Kleenex holders \$400.00 Towels (hand, bath and face) \$500.00
- (1) Box 1960's comic books 200 good to perfect condition \$2,000
- (1) Box of baseball and football cards 150 from late 50 early 60's good to mint condition \$2,500.00

Total for this room \$8,550.00

**D. SPARE BEDROOM**

- (3) Department store dressing mirrors (3 'x6') On metal legs \$3,000.00
- (1) New square wood table \$500.00
- (3) Cases of men's shoes \$600.00
- (1) Floor model 1950 AM Record player old tube style \$150.00

(1) Box of 45's and 33 records at least 200 still in sleeve \$1,500.00

(1) 8-track tape player table included \$300.00

(2) Remote control cars \$600.00

(1) Chest type wood file cabinets \$70.00

(1) Eureka rug shampooer \$150.00

(1) Paper shredder \$25.00

(2) CD players \$ 100.00

Total for this room \$ 6,995.00

E. **MASTER BEDROOM**

Military uniforms, awards and medals \$ 400 \$400.00

(3) Greyhound plaques, several awards, 8 gold watches, 5 reg watches, Several diamond and gold rings (10-12) \$8,000.00 Gold rope necklace and two gold necklaces \$500.00

(2) Sets of cuff links, one gold and one silver \$150.00 Approx. 20 bottles of Men's cologne \$500.00 King size bed, Amour, seven drawer dresser with Center mirror and comer what not shelves \$4,500.00

(1) 27" color TV with VCR and DVD surround Sound system w/remote control \$1,500.00

(1) 2ft tall beige combination safe (contents: \$9300 in cash and two checks, Military papers and medals) \$10,000.00

(1) 3 gallon fabric bank bag with over \$300 in silver and pennies \$300.00 (1) End table \$300.00

(1) Lamp \$200.00

(1) Gold leafed 4ft curio cabinet with' 3 shelves \$400.00 30 to 40 pairs of men's shoes \$3,500.00

(4) Pair western booths (bal, br, tan and burg.) \$550.00

(10) Men's suites -five never worn \$3,500.00

(50) Dress and casual shirts \$1,500.00

(25) Sweaters \$2,000.00

(1) Suite contained \$800 in the pocket \$800.00

(4) Bathrobes \$350.00

(1) Long Men's black leather coat \$600.00

- (1) 3 quarter brown leather coat \$800.00
- (3) Short leather jackets (2 brown & 1 black) \$600.00
- (8) Sport Jackets \$900.00
- (35) Dress slacks \$1,800.00
- (10) Pair of Jeans Underwear, socks, handkerchiefs \$600.00
- (20) Handkerchief tie sets \$200.00
- (7) Hats \$150.00
- (25) Ties \$150.00
- (7) Belts \$200.00 (1) Large wall picture 3X4 \$400.00
- (1) Gold and silver wall clock \$100.00
- (2) Large gold wall candle holders \$200.00
- Total for this room \$ 45,650.00

**F. GUEST BEDROOM**

- (1) Full size bed with matching dresser, hutch and mirror \$2,500.00
- (2) End tables \$300.00
- (2) Lamps \$200.00 Pictures, oval, gold floor mirror and other decorative 'Accessories \$2,000
- Curtains \$300.00
- Total for this room \$ 5,300.00

**G. BATHROOMS**

- (2) Complete with shower curtains, liners, rugs towels And decorations \$400.00
- Master bathroom included shaving and personal Items, medication, clippers, shavers, electric Toothbrushes, etc. \$300.00
- HALF BATH - Towels, extra soap, toothpaste, and cleaning items Rugs, pictures, and accessories \$150.00
- Total for this room \$ 850.00

**H. BACK PORCH**

- (1) Restaurant style booth \$400.00
- (3) Coolers \$150.00
- (1) Small wooden table \$80.00
- (1) 50 gallon barrel barbecue grill on wheels \$175.00
- (1) Antique peddle sewing machine Singer \$1,500.00
- (1) 6ft weight bench with exercise attachments \$500.00
- (4) Outdoor speakers \$150.00

(1) Swimming pool cover \$200.00 Pool supplies \$400.00

(1) Child's basketball goal \$50.00

(4) Kerosene lanterns \$ 60.00

(6) Wooden bar stools \$175.00

Total for this room \$ 3,840.00

**I. ATTIC**

All family albums and photos cost to make the pictures only (CAN'T BE REPLACED) \$2,000.00

(1) six foot Christmas tree \$150.00

(8) boxes of Christmas decorations \$600.00

(1) box of outside lights \$150.00

Total for this room \$ 2,900.00

**J. STORAGE SHED IN BACKYARD**

(2) Self propelled lawnmowers \$350.00

(2) Gas powered edger \$200.00

(2) Weed eaters (one) with saw attachments \$350.00

(2) Mechanical toolboxes with tools (six drawer) \$3,000.00

Assorted gardening tools \$500.00 Table saw \$300.00

(2) Circular saws \$350.00

(2) Electric Drills \$150.00 Tool Belt \$20.00

(1) Staple gun \$35.00

(2) Work lights \$75.00

(1) Power sprayer \$75.00

(4) Shoe racks \$40.00

(2) 10X10 tents \$200.00

(2) Bird Baths \$50.00

(2) Remote control ceiling fans \$150.00

(1) Sledge hammers \$20.00

(2) Wheels dollies \$100.00

(2) Wheel ramps \$50.00

(1) Hand held sander \$50.00

- (1) Jigsaw \$30.00
- (4) 6ft Tables \$200.00
- (2) Remote control airplanes - \$250.00
- Total for this room \$ 6,545.00

2. The items listed above have been totaled by room and the amounts are listed below:

Formal living room	\$ 1,900.00
Den	\$ 10,400.00
Hall Linen Closet	\$ 8,550.00
Spare Bedroom	\$ 6,995.00
Master Bedroom	\$ 45,650.00
Guest Bedroom	\$ 5,300.00
Bathrooms	\$ 850.00
Back Porch	\$ 3,840.00
Attic	\$ 2,900.00
Storage Shed	\$ 6,545.00
Papers and Related documents	Value unknown

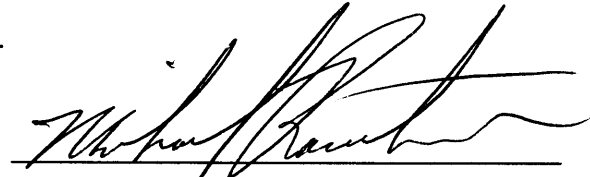
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\* Total of All Personal Items \$ 92,930.00

\* This is the estimated total of the items that have been listed, but is subject to change if other items are remembered during the discovery process. This is the estimated price and/or amount that it would take to replace the items taken and/or destroyed by the defendants

3. The above personal items listed is the best list that the Plaintiff can provide at this point in time as he is having to base this on memory because all records, receipts, pictures, etc were taken from him by the Defendants.

Done this the 1<sup>st</sup> day of December, 2005.

  
Michael Rountree, (ROU009)  
Counsel for the Plaintiff

Of Counsel:

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CERTIFICATE OF SERVICE

I hereby certify that I have this 1<sup>st</sup> day of December, 2005, served a copy of the foregoing amended complaint to all known parties to this proceeding by placing the same in the United States mail, properly addressed and first-class postage prepaid to the following counsel of record.


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